

APPENDIX A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: FTX TRADING LTD., <i>et al.</i> , ³ Debtors.	Chapter 11 Case No. 22-11068 (JTD) (Jointly Administered)
AUSTIN ONUSZ, CEDRIC KEES VAN PUTTEN, NICHOLAS J. MARSHALL and HAMAD DAR, on behalf of themselves and all others similarly situated, Plaintiffs, v. WEST REALM SHIRES INC., WEST REALM SHIRES SERVICES INC. (D/B/A FTX US), FTX TRADING LTD., ALAMEDA RESEARCH LLC, SAM BANKMAN-FRIED, ZIXIAO WANG, NISHAD SINGH and CAROLINE ELLISON, Defendants.	Adv. Pro. No. 22-50513 (JTD)

REVISED CASE MANAGEMENT PLAN AND SCHEDULING ORDER

1. This Revised Case Management Plan and Scheduling Order (this “CMO”) shall apply in the above-captioned adversary proceeding as to Mr. Bankman-Fried (together with the above-captioned Plaintiffs, the “Parties”), who is the last remaining defendant.
 - a. The term “Complaint” as used herein shall mean the complaint filed in the above-captioned adversary proceeding on December 27, 2022.
 - b. Mr. Bankman-Fried’s deadline to file an answer to the Complaint, if any, shall be governed by Bankruptcy Rule 7012(a) or as otherwise agreed to by the Parties.

³ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

- c. Mr. Bankman-Fried reserves all rights, claims, and defenses, other than those relating to service of process or sufficiency of process.

2. The following discovery and pretrial schedule shall apply absent further agreement of the Parties or order of the Court.

- a. **Initial Disclosures.** Each Party shall serve its initial disclosures required by Rule 26(a)(1) (BR 7026) no later than June 18, 2024.

- b. **Fact Discovery.**

- i. Deposition notices or non-party subpoenas seeking deposition testimony shall be served no less than 14 days prior to the deposition date. The Parties shall work to find mutually agreeable deposition dates wherever practicable.
- ii. Fact discovery shall be completed by August 1, 2025.

- c. **Expert Discovery.**

- i. Plaintiffs' initial expert reports shall be served by August 15, 2025.
- ii. Mr. Bankman-Fried's expert reports—including rebuttal reports in response to Plaintiffs' initial expert reports and expert reports on a subject not addressed in Plaintiffs' initial expert reports—shall be served by September 15, 2025.
- iii. In the event that Mr. Bankman-Fried's expert reports address a subject not addressed in Plaintiffs' initial expert reports, Plaintiffs may serve a rebuttal expert report in response thereto by October 15, 2025..
- iv. All expert reports must satisfy the requirements of Bankruptcy Rule 7026.
- v. Expert depositions shall be completed by November 14, 2025.

- d. **Summary Judgment Motions.**

- i. Motions for summary judgment shall be due no later than December 15, 2025.
- ii. Oppositions to motions for summary judgment shall be due no later than January 15, 2026.
- iii. Replies in support of summary judgment shall be due no later than February 16, 2026.

3. **Jurisdiction.** Nothing in this CMO shall be deemed a waiver of Mr. Bankman-Fried's rights under Local Rule 9013-1(f) or other jurisdictional objections or objections to the extraterritorial application of certain law.

4. **Modification.** The Parties may modify any provision hereof on written agreement or, absent such agreement, by seeking an order of the Court upon good cause shown.